



Michael Lumer <mlumer@gmail.com>

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**Payne v. Mejia, et al., 17-cv-0717 (FB)(LB): Meet & Confer re Protective Order**

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**Goykadosh, Brachah (Law)** <bgoykado@law.nyc.gov>

Thu, Oct 19, 2017 at 6:02 PM

To: Michael Lumer <mlumer@lumerlaw.com>

Cc: Amy Rameau <amywmrameau@hotmail.com>, Amy Rameau <rameaulawny@gmail.com>

Dear Mr. Lumer:

Per our meet and confer earlier today, I am attaching a revised Stipulation of Confidentiality and Protective Order. Defendant has modified paragraph 11 of the Protective Order to mirror the language found in the Local Rule 83.10 Protective Order. Defendant has also removed the destruction clause (previously paragraph 15) from the Protective Order.

We cannot modify any of the items in paragraph 2 of the Protective Order. As we discussed, Defendant hopes that Plaintiff will re-consider their position regarding the IAB file. Paragraph 14 of the Protective Order specifically addresses filings with the Court on a motion or use at trial.

I am hoping that we can resolve this issue without judicial intervention. While I will not be available to confer tomorrow, I will be checking emails, and am happy to further speak on Monday, to the extent necessary.

Thanks. All best,

**Brachah Goykadosh**

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**From:** Goykadosh, Brachah (Law)  
**Sent:** Thursday, October 19, 2017 1:35 PM  
**To:** 'Michael Lumer'  
**Cc:** Amy Rameau; Amy Rameau  
**Subject:** RE: Payne v. Mejia, et al., 17-cv-0717 (FB)(LB): Meet & Confer re Protective Order

Let's confer at 3 p.m. today then. Thanks.

**From:** Michael Lumer [<mailto:mlumer@lumerlaw.com>]  
**Sent:** Thursday, October 19, 2017 12:42 PM  
**To:** Goykadosh, Brachah (Law)  
**Cc:** Michael Lumer; Amy Rameau; Amy Rameau  
**Subject:** Re: Payne v. Mejia, et al., 17-cv-0717 (FB)(LB): Meet & Confer re Protective Order

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**Payne Stipulation of Confidentiality and Protective Order, following Meet & Confer.pdf**  
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